

EXHIBIT A

EXHIBIT A

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF BRONX

-----X
VIRGILIO GUERRERO,

Plaintiff,

against

TYRONE SAMUEL
and UN MISSION OF GRENADA,

Defendant,
-----X

Index No.

Summons

Plaintiff's Residence

101 East Tremont Avenue Apt 5A
Bronx, NY 10453

The basis of venue designated is:
Plaintiff(s) residence.

To the above named Defendant(s)

You are hereby summoned to answer the complaint in this action, and to serve a copy of your answer, or if the complaint is not served with this summons, to serve a notice of appearance on the plaintiff's attorney(s) within twenty days after the services of this summons exclusive of the day of service, where service is made by delivery upon you personally within the state, or within 30 days after completion of service where service is made in any other manner. In case of your failure to appear or answer, judgment will be taken against you by default for the relief demanded in the complaint.

DATED: New York, New York
May 13, 2019

Harmon, Linder & Rogowsky
Attorneys for Plaintiff(s)
3 Park Avenue, 23rd Floor
Suite 2300
New York, NY 10016

Defendant's Address:
TYRONE SAMUEL
27-27 12 Street, apt base
Queens, NY 11102

UN MISSION OF GRENADA
800 2nd Avenue, apt 400 K
New york, NY 10017

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF **BRONX**

-----X
VIRGILIO GUERRERO,

Plaintiff

VERIFIED COMPLAINT

-against-

Index No.:

TYRONE SAMUEL
and UN MISSION OF GRENADA,

Defendants.

-----X
Plaintiff, complaining of the defendants herein by her attorneys,
HARMON, LINDER & ROGOWSKY, ESQS., respectfully sets forth and
alleges, as follows:

**AS AND FOR A CAUSE OF ACTION
ON BEHALF OF PLAINTIFF VIRGILIO GUERRERO**

1. That at the time of the commencement of this action, plaintiff **VIRGILIO GUERRERO**, was a resident of the County of **BRONX**, State of New York.
2. Upon information and belief, that at all times herein mentioned defendant, **UN MISSION OF GRENADA**, was a corporation authorized to do business in the State of New York.
3. Upon information and belief, that at all times herein mentioned defendant, **UN MISSION OF GRENADA**, was the owner of a

motor vehicle bearing registration number 0001TYD, State of New York.

4. Upon information and belief, that at all times herein mentioned defendant, **TYRONE SAMUEL**, was the operator of the aforesaid motor vehicle bearing registration number 0001TYD, State of New York.

5. Upon information and belief, that at all times herein mentioned defendant **TYRONE SAMUEL**, was in physical charge, operation, management and control of the aforesaid vehicle owned by the defendant **UN MISSION OF GRENADA**, with the knowledge, consent, and permission, either express or implied, of the defendant owner thereof.

6. Upon information and belief, that at all times herein mentioned, plaintiff **VIRGILIO GUERRERO**, was the operator of a motor vehicle bearing registration number **T731225C**, State of New York.

7. That on the 19th day of July, 2018, at approximately at 2:20 A.M., the aforesaid vehicles came into contact with each other on **WEST 42nd STREET**, at or near its intersection with **DYER AVENUE**, in the County of New York, State of New York.

8. That the defendants so carelessly and negligently operated their respective aforesaid motor vehicles so as to cause the aforesaid contact.

9. That as a result of the foregoing, this plaintiff was caused to and did sustain severe and serious injuries and was required to seek and obtain medical care and attention in an effort to cure and alleviate same and, upon information and belief, will be compelled to do so in the future.

10. That the aforesaid occurrence and the injuries sustained by this plaintiff were caused by the negligence of the defendants.

11. That this plaintiff has sustained a serious injury as the same is defined in Subdivision "d" of Section 5102 of the Insurance Law.

12. That upon information and belief, this action falls within one or more of the exceptions set forth in Section 1602 of the CPLR.

13. That by reason of the foregoing, plaintiff **VIRGILIO GUERRERO**, has been damaged in an amount that exceeds the jurisdictional limits of all lower courts that otherwise have jurisdiction.

WHEREFORE, plaintiff VIRGILIO GUERRERO, demands a judgment against the defendants in the Cause of Action in an amount which exceeds the jurisdictional limits of all lower courts that would otherwise have jurisdiction; all together with the costs and disbursements of this action.

Dated: New York, New York
April 11, 2019

HARMON, LINDER & ROGOWSKY
Attorneys for Plaintiff
3 Park Avenue Suite 2300
New York, NY 10016
Phone (212) 732-3665
Fax (212) 732-1462
MJL\jgd

ATTORNEY'S VERIFICATION

STATE OF NEW YORK)
) ss:
COUNTY OF NEW YORK)

I, the undersigned, am an attorney admitted to practice in the Courts of New York State,
and say that:

I am the attorney of record or of counsel with the attorney(s) of record for plaintiff.

I have read the annexed SUMMONS AND VERIFIED COMPLAINT and know the
contents thereof and the same are true to my knowledge, except those matters therein which are
stated to be alleged on information and belief. As to those matters, I believe them to be true.

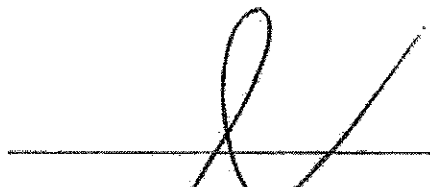
My belief, as to those matters therein not stated upon knowledge is based upon the following:

Interviews and/or discussions with the plaintiff(s) and papers and/or documents in the file.

The reasons I make this affirmation instead of the plaintiff is because said plaintiff
resides outside of the county from where your deponent maintains his office for the practice of
law.

Dated: New York, New York

May 13, 2019



Mark J. Linder Esq.,

Index No. Year
 SUPREME COURT OF THE STATE OF NEW YORK
 COUNTY OF BRONX

VIRGILIO GUERRERO,

Plaintiff,

against

TYRONE SAMUEL
 and UN MISSION OF GRENADA,
 Defendant.

SUMMONS AND VERIFIED COMPLAINT

HARMON, LINDER & ROGOSWKY, ESQS.

Attorney for Plaintiff(s)
 3 Park Avenue, 23rd Floor
 Suite 2300
 New York, NY 10016
 (212) 732-3665 Phone
 (212) 732-1462 Facsimile

To:
 Attorney(s) for Defendant

Service of a copy of the within Summons and Complaint is hereby admitted.

Dated:

Attorney(s) for

PLEASE TAKE NOTICE

- ☐ Notice of Entry that the within is a (certified) true copy of a
 entered in the office of the clerk of the within named Court on
- ☐ Notice of Settlement
 that an order of which the within is a true copy will be presented for settlement to the
 Hon. _____, one of the judges of the within named Court, at _____,
 on _____.

Dated: May 13, 2019

Yours, etc.
 Harmon, Linder & Rogowsky
Attorneys for Plaintiff
 3 Park Avenue, 23rd Floor
 Suite 2300
 New York, NY 10016
 (212) 732-3665